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MEXICO CITY SÉNECA NO. 425 FEDERAL COMMUNICATIONS COMMISSION 11560 MÉXICO, D.F.
OFFICE OF THE CONDITION

(214) 999-4219

April 24, 1995

William F. Caton Acting Secretary Federal Communications Commission 1919 M Street, N.W., Room 222 Washington, D.C. 20554

WT Dkt. No. 94-148

Dear Mr. Caton:

On April 20, 1995, representatives of the Telecommunications Industry Association and the National Spectrum Managers Association ("TIA/NSMA") met with Commission staff to discuss the abovereferenced proceeding. Pursuant to Section 1.1206 of the Commission's Rules, TIA/NSMA herewith submit the written materials discussed at this meeting. These written materials reflect the discussion at this meeting.

In attendance for the Commission were Robert James and Michael Hayden of the Wireless Telecommunications Bureau. In attendance for TIA/NSMA were:

George Kizer (Alcatel Network Systems, Inc. ("Alcatel") and Chairman of the TIA Fixed Point-to-Point Communications Section) William Lye (EMI Communications and President of NSMA) Kam Falkenthal (Bellcore) Chris Hardy (Comsearch) Larry Blosser (MCI) Leonard R. Raish, Esq. (Counsel for Harris Corporation - Farinon Division) Robert J. Miller (Counsel for TIA/NSMA and Alcatel)

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Should there by any questions concerning this matter, kindly contact the undersigned.

Sincerely,

Robert J. Miller

RJM/dwt Enclosures

cc (w/encs.): I

Robert James Michael Hayden

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**PART 101** 

APRIL 20, 1995

ASSOCIATION/NATIONAL SPECTRUM MANAGERS ASSOCIATION TELECOMMUNICATIONS INDUSTRY



### **OVERVIEW OF TIA/NSMA PROPOSALS**

- RECORD OF <u>NPRM</u> SHOWS REMARKABLE CONSENSUS OF USERS, MANUFACTURERS AND FREQUENCY COORDINATORS CLEARLY SUPPORTING ADOPTION OF TIA/NSMA PROPOSALS.
- TREAT CC AND POFS USERS THE SAME.
- PERMIT USE OF ATPC BASED ON TIA BULLETIN 10-F.
- CONSOLIDATE ALL TECHNICAL RULES FOR POFS AND CC USERS INTO SUBPART C.
- ESTABLISH TRANSITION PERIOD FROM PARTS 21/94 TO PART 101 FOR SYSTEMS AND EQUIPMENT.



- SIMPLIFY APPLICATION AND MODIFICATION PROCEDURES.
- PERMIT PRE-AUTHORIZATION CONSTRUCTION AND OPERATION.
- 18 MONTH CONSTRUCTION PERIOD FOR POFS AND CC USERS.



# ATPC MUST BE AUTHORIZED CONSISTENT WITH TIA'S BULLETIN 10-F

- BULLETIN 10-F PERMITS TRANSMITTERS TO OPERATE AT LOWER DB LEVEL THAN LEVEL SPECIFIED ON LICENSE.
- NO PARTY SUPPORTS FCC PROPOSAL LIMITING ATPC TO 3 DB INCREASE IN POWER.
- BULLETIN 10-F CRITERIA LIMIT USE OF ATPC ONLY WHEN IT IS NECESSARY AND ONLY FOR SHORT TIME PERIODS.
- BULLETIN 10-F ALLOWS UP TO A 10 DB COORDINATION ADVANTAGE (WITH JUSTIFICATION).



- PCN FOR AN ATPC SYSTEM MUST SHOW:
  - Maximum transmit power.
  - Coordinated transmit power.
  - Nominal transmit power.
- CONCERNS RAISED BY PACIFIC BELL AND OTHERS ARE UNJUSTIFIED.



### CONSOLIDATE ALL TECHNICAL RULES FOR POFS AND CC USERS INTO SUBPART C

- STRONG PUBLIC SUPPORT (API, SBC, AIRTOUCH, UTC, GTE, ETC.)
- FREQUENCY COORDINATION
  - Supplement PCN data to include line loss specifications.
  - "Use it or lose it" for growth channels instead of 6-month holding period.

- Oral PCN permitted with written follow-up upon request.
- Adopt definition for "prior coordination."

### INTERFERENCE PROTECTION

- Need definition for "practical threshold."
- Relax standards if all parties consent.
- Prescribe resolution procedures.

### • FREQUENCY TOLERANCE

- Include specifications for 4, lower 6, 11 GHz bands.
- Address heterodyne equipment.

#### BANDWIDTH

- Include table specifying maximum authorized bandwidths for individual frequency bands (not in NPRM.)
- Important because defines maximum bandwidth for frequency bands with no channel plan.

### TRANSMITTER POWER

- Single standard at +55 dBW EIRP.

Consistent with industry standards.

### ANTENNAS

- Must define criteria for identifying party paying upgrade costs and for "congested areas."
- Clarify that antenna standards cover all fixed stations operating at 900 MHz or higher.
- Permit cross-polarization.
- Polarization can be vertical or horizontal, not circular (unless waiver granted).

### CHANNEL LOADING

- Digital modulation requirements apply to frequencies below 19.7 GHz.
- Loading requirements apply to commercially available equipment.
- More relaxed loading criteria to meet concerns by API, AAR.
- No voice channel loading requirements for digital equipment.
- No transmitter spike requirements.



### MAXIMUM EIRP FOR SHORT PATHS

- Adopt Comsearch proposal because it allows installation of short paths without a significant sacrifice in power.
- AT&T, which submitted only other proposal, now supports adoption of Comsearch formula.
- FCC proposal less preferable because it provides a more graduated reduction of power at transmitter point.
- Adopt definition for "path length."

### FREQUENCIES

- Consolidate into single table.



### **ESTABLISH TRANSITION PERIOD**

- GRANDFATHER EXISTING <u>SYSTEMS</u> UNDER PARTS 21/94 SO THAT THEY ARE CO-PRIMARY WITH PART 101 LICENSEES.
- GRANDFATHER <u>EQUIPMENT</u> AUTHORIZED UNDER PARTS 21/94 SO THAT SUCH EQUIPMENT CAN BE USED WITH PART 101 SYSTEMS UNLESS THEY DO NOT MEET APPLICABLE REQUIREMENTS.



### SIMPLIFY APPLICATION AND MODIFICATION PROCEDURES

- USE SINGLE APPLICATION FORM.
  - Industry will help develop.
- SINGLE RULE GOVERNING APPLICATION REQUIREMENTS
  - Rule specifies that following equipment must be identified in application:

Applicant's name and address.

Transmitting station name.

Transmitting station coordinates.

Frequencies and polarizations to be added, changed or deleted.

Transmitting equipment type, its stability, actual output power, emission designator, and type of modulation (loading).

Transmitting antenna type(s), model, gain, and, if required, a radiation pattern provided or certified by the manufacturer.

Transmitting antenna center line height(s) above ground level and ground elevation above mean sea level.

Receiving station name.

Receiving station coordinates.

Receiving antenna type(s), model, gain, and, if required, a radiation pattern provided or certified by the manufacturer.

Receiving antenna center line height(s) above ground level and ground elevation above mean sea level.

Path azimuth and distance.

Estimated transmitter transmission line loss expressed in dB. Estimated receiver transmission line loss expressed in dB.

- Rescind September 1994 Public Notice eliminating requirement that applicant filing Form 494 must specify what transmitters/antennas are to be used.

- Supplemental showing for prior coordination in this rule.
- REQUIREMENTS FOR MINOR MODIFICATIONS CLARIFIED.
  - Frequency coordination.
  - Changes in antenna height.
  - PCN required only for new or "major" modification application; notice letter for minor modifications.
- ELECTRONIC FILING SUPPORTED.



# PERMIT PRE-AUTHORIZATION CONSTRUCTION AND OPERATION/ESTABLISH LONGER CONSTRUCTION PERIOD

- PERMIT CC <u>AND</u> POFS USERS TO CONSTRUCT PRIOR TO PERMANENT AUTHORIZATION.
- GRANT BSTA TO POFS AND CC USERS.
- EXPAND SCOPE OF TFAs TO INCLUDE FACILITIES INTENDED FOR USE ONLY UNTIL REPLACEMENT FACILITIES, INCLUDING PERMANENT MICROWAVE FACILITIES, CAN BE CONSTRUCTED AND PLACED INTO OPERATION.
  - Must be prior coordinated.

- TFA holder must file for permanent authorization of same or different facilities within 90 days and must prior coordinate indicating desire for permanent authorization.
- Revise definition for "Temporary Fixed Authorization."
- ALLOW 18 MONTHS, NOT 12 MONTHS, FOR CC AND POFS USERS TO COMPLETE CONSTRUCTION.

### TIA/NSMA MEMBER COMPANIES PARTICIPATING IN PART 101

P-COM

HARRIS-FARINON

**BELLCORE** 

MCI

**UNION PACIFIC** 

COMSEARCH

**EMI COMMUNICATIONS** 

AT&T CORP.

DIGITAL MICROWAVE CORPORATION

**CSI TELCO** 

**PEPCO** 

MRC TELECOM

**NEW JERSEY BELL** 

**US WEST** 

ALCATEL NETWORK SYSTEMS

MNI

**TEXACO E&P** 

SOUTHWESTERN BELL TELEPHONE

GTE TELEPHONE